

JACOB D. BUNDICK, ESQ. (NBN: 9772)  
GREENBERG TRAURIG, LLP  
3773 Howard Hughes Parkway, Suite 400 North  
Las Vegas, Nevada 89169  
Telephone: (702) 792-3773  
Facsimile: (702) 792-9002  
Email: bundickj@gtlaw.com

*Attorneys for Defendant  
JPMorgan Chase Bank, N.A.*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ROSHONDA MAYFIELD,  
  
Plaintiff,  
  
vs.  
  
CAPITAL ONE BANK, N.A., et al.,  
  
Defendants.

Case No.: 2:17-cv-03097-RFB-PAL

**STIPULATION AND ORDER TO (I) STAY  
DISCOVERY FOR A LIMITED TIME; AND  
(II) CONTINUE CASE MANAGEMENT  
DEADLINES**

The parties, by and through their undersigned counsel, stipulate and agree as follows:

1. On December 21, 2017, Plaintiff Roshonda Mayfield filed her Complaint for Damages Pursuant to the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq. [Dkt. 1] (the “Complaint”).

2. On February 9, 2018, Defendant Experian Information Solutions, Inc. (“Experian”) served Plaintiff with written discovery requests, including interrogatories, requests for admission, and requests for production. Experian also noticed Plaintiff’s deposition for March 28, 2018.

3. Also on February 9, 2018, Defendant Trans Union, LLC (“Trans Union”) served Plaintiff with written discovery requests, including interrogatories, requests for admission, and requests for production.

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4. On February 15, 2018, Defendant JPMorgan Chase Bank, N.A. (“JPMC” or “Defendant”) filed a Motion to Dismiss the Complaint [Dkt. 19] (the “Motion to Dismiss”) which remains pending before the Court. On March 15, 2018, pursuant to a stipulated extension, Plaintiff filed her Opposition to JPMC’s Motion to Dismiss [Dkt. 31].

5. On February 16, 2018, Plaintiff served JPMC with written discovery requests, including interrogatories, requests for admission, and requests for production (the “Discovery Requests”). Plaintiff also served a Rule 30(b)(6) deposition notice upon JPMC noticing a deposition for April 6, 2018 (the “Deposition Notice”).

6. On February 20, 2018, after communications concerning Plaintiff’s availability, Experian re-noticed Plaintiff’s deposition for April 13, 2018. And on February 21, 2018, Trans Union cross-noticed Plaintiff’s deposition for the same date.

7. On March 2, 2018, JPMC moved the Court for an order staying discovery pending this Court’s ruling upon the Motion to Dismiss [Dkt. 30] (the “Motion to Stay”).

8. Pursuant to LR 26-7, the parties met and conferred regarding the Motion to Stay, the Discovery Requests, and the Deposition Notice. During the course of these discussions, counsel for JPMC advised counsel for Plaintiff that it intended to seek a protective order on account of the pending Motion to Stay.

9. To maintain the status quo pending the Court’s ruling upon JPMC’s Motion to Stay, avoid the additional burden on the parties and the Court resulting from briefing a request for a protective order on shortened time, and to facilitate possible settlement discussion, the parties are in agreement that discovery shall be stayed as to all parties through and including the date upon which the Court rules upon the Motion to Stay. In the event the Court denies the Motion to Stay, responses to any outstanding discovery requests of the parties shall be served no later than fourteen (14) days following the date of entry of the Court’s Order upon the Motion to Stay.

10. In light of the limited stipulated stay of discovery pending the Court’s ruling on Chase’s Motion to Stay, the parties further agree that following case management deadlines shall be continued for thirty (30) days as follows:

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Event	Existing Deadline	Continued Deadline
Discovery Cut-Off	July 16, 2018	<b>August 15, 2018</b>
Deadline to Amend Pleadings	April 17, 2018	<b>May 17, 2018</b>
Deadline to Disclose Initial Expert Disclosures	May 17, 2018	<b>June 18, 2018<sup>1</sup></b>
Deadline to Disclose Rebuttal Expert Disclosures	June 18, 2018	<b>July 18, 2018</b>
Deadline to File Dispositive Motions	August 15, 2018	<b>September 14, 2018</b>

11. **Interim Status Report.** The parties shall file the interim status report required by LR 26-3 no later than **June 18, 2018<sup>2</sup>** or sixty (60) days prior to the close of discovery.

12. **Pre-Trial Order:** The parties shall file a joint pretrial order no later than **October 15, 2018<sup>3</sup>** or thirty (30) days after the date set for filing dispositive motions. In the event that parties file dispositive motions, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision on the dispositive motions or further order of the Court. The disclosure required by Federal Rule of Civil Procedure 26(a)(3) and objections thereto shall be made in the pre-trial order.

13. All other terms and provisions of the Court's Stipulated Discovery Plan and Scheduling Order entered on February 23, 2018 [Dkt. 24], and not amended hereby, shall remain in full force and effect.

**IT IS SO STIPULATED.**

DATED: March 20, 2018.

PAYNE LAW FIRM LLC

GREENBERG TRAUIG, LLP

/s/ Sean N. Payne, Esq.

/s/ Jacob D. Bundick, Esq.

SEAN N. PAYNE, ESQ. (NBN: 13216)  
9550 S. Eastern Ave., Suite 253-A213  
Las Vegas, NV 89123  
*Attorneys for Plaintiff Roshonda Mayfield*

JACOB D. BUNDICK, ESQ. (NBN: 9772)  
3773 Howard Hughes Pkwy., Suite 400 N  
Las Vegas, NV 89169  
*Attorneys for JPMorgan Chase Bank, N.A.*

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<sup>1</sup> June 16, 2018 is a Saturday.

<sup>2</sup> June 16, 2018 is a Saturday.

<sup>3</sup> October 14, 2018 is a Sunday.

1 LEWIS BRISBOIS  
2 BISGAARD & SMITH LLP

3 /s/ Jason G. Revzin, Esq.  
4 JASON G. REVZIN, ESQ. (NBN: 8629)  
5 6385 S. Rainbow Blvd., Suite 600  
6 Las Vegas, NV 89118  
7 *Attorneys for TransUnion, LLC*

8  
9 FERNALD LAW GROUP LLP

10 /s/ Brandon Fernald, Esq.  
11 BRANDON FERNALD, ESQ. (NBN: 10582)  
12 6236 Laredo Street  
13 Las Vegas, NV 89146  
14 *Attorneys for Capital One Bank, N.A.*

SNELL & WILMER LLP

15 /s/ Bradley T. Austin, Esq.  
16 BRADLEY T AUSTIN, ESQ. (NBN: 13064)  
17 3883 Howard Hughes Pkwy., Suite 1100  
18 Las Vegas, NV 89169  
19 *Attorneys for Equifax Information*  
20 *Services, LLC*

NAYLOR & BRASTER

21 /s/ Jennifer L. Braster, Esq.  
22 JENNIFER L. BRASTER, ESQ. (NBN: 9982)  
23 1050 Indigo Drive, Suite 200  
24 Las Vegas, NV 89145  
25 *Attorneys for Experian Information*  
26 *Solutions, Inc.*

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**IT IS SO ORDERED** this 6th day of April, 2018.

  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

Under Fed. R. Civ. P. 5(b), I certify that on March 20, 2018, a copy of the foregoing **STIPULATION AND ORDER TO (I) STAY DISCOVERY FOR A LIMITED TIME; AND (II) CONTINUE CASE MANAGEMENT DEADLINES** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's CM/ECF system, and parties may access this filing through the Courts' CM/ECF system.

/s/ Shayna Noyce

An employee of Greenberg Traurig, LLP

**GREENBERG TRAURIG, LLP**  
3773 Howard Hughes Parkway  
Suite 400 North  
Las Vegas, Nevada 89169  
Telephone: (702) 792-3773  
Facsimile: (702) 792-9002